

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:15-CR-0478-B

v.

ALLEN NASH, A.K.A. "A-1"

Government's Expert Designation

The United States of America respectfully notifies the Court and the defendant of its Designation of Expert Witnesses in this case:

Dr. Shannon Wolf
Associate Director of the Counseling Program and
Professor of Psychology and Counseling
BH Carroll University

Dr. Shannon Wolf is an expert in psychology and counseling, with a focus on trauma and care for trafficking and sexual assault victims. She previously served as a professor at Dallas Baptist University, where she has taught from 2002 until 2016, when she joined the faculty at BH Carroll University. She holds a Doctorate in Philosophy/Psychology and Counseling from Southwestern Baptist Theological Seminary and Master's Degrees in Marriage and Family Counseling and Christian Education from the same institution, as well. From 2008 through 2016, she served as an Associate Professor of Master of Arts in Counseling at Dallas Baptist University, where she taught psychology and counseling courses to master's level students. She currently teaches at the B.H. Carroll Theological Institute, where she serves as the Associate

Director of Counseling Programs and a Professor of Psychology and Counseling. She has served as a member of the Traffick911 Advisory Board since 2010, and she has also served on the Texas Attorney General's Task Force since 2012 assisting with research and development of minimum standards of care for organizations providing homes and services for trafficked individuals in Texas. She has also served as a consultant for Homeland Security for Human Trafficking issues since 2013, specifically consulting on methods for interviewing child trafficking victims and methods for avoiding secondary trauma. She has given numerous presentations on sex trafficking and sexual assault and the impact on victims. She has previously testified as an expert in two criminal trials in the Northern District of Texas in the past two years.

She is expected to testify regarding her educational and professional background, specifically regarding her clinical, practical and academic work with trauma, sex trafficking and sexual assault victims. She is also expected to testify regarding the impact sex trafficking has on victims including, among others: experiencing trauma both during and after being trafficked, becoming severally depressed and/or angry, and the often long term nature of the trauma on victims including a dramatic change in victim's behavior following being trafficked. Likewise, she is expected to testify regarding the methods of psychological control traffickers have over their victims, including the common pattern of threats/physical abuse followed by periods of seeming kindness, and then back to threats/physical abuse, and how they control their victims even when they are not physically present through violence. In addition, she is expected to testify

regarding the significance of threats of violence both to the victim and their family. She will also discuss why sex trafficking victims continue to engage in commercial sex acts when they do not want to, in order to appease their traffickers, and why they have difficulty making an outcry for help.

In addition, she is expected to testify about how some victims believe they love their trafficker, and the psychological manipulation used by traffickers to cause victims to do what they want them to. Along this same line, she is expected to discuss how some trafficking victims feel loyalty to the trafficker, even when they have been repeatedly violent with them and even when they have threatened them and coerced them to engage in commercial sex acts, sometimes over extended periods of time.

She is further expected to explain why victims of this pattern by their pimp/trafficker often feel powerless or unable to leave the situation because of the threats of violence and/or actual violence, a concept called the trauma bond. She is also expected to testify regarding how children are even more susceptible to manipulation, coercion and threats by traffickers because of their reduced awareness and comprehension of what is happening to them and how violence and threats of violence impact children. She is expected to talk about common traits of sex trafficking victims including: history of past sexual assault/abuse, lack of strong relationships with parents (and especially fathers), and a weakened capacity to remove themselves from the situation (either because they are children or because they are homeless or both). She is further expected to testify regarding common victim behavior both during and after a

traumatic trafficking encounter as well as the long term effects of being trafficked, including an inability to trust people, being unable to sleep/having nightmares, weight loss or gain, a persistent feeling of being unsafe and long term shame and guilt about what happened.

Finally, she is expected to testify regarding how the victims' in this case behavior is consistent with trafficking victims, both during and after being trafficked.

The Government has provided the defense with Dr. Wolfe's Curriculum Vitae.

**HSI Special Agent Hakan Catalan
North Texas Trafficking Taskforce**

Special Agent Hakan Catalan has been employed with HSI since 2006. He was assigned to the human smuggling/human trafficking unit in HSI's Dallas office from 2014 through October of 2016. Previously, Agent Catalan worked in the Tyler, Texas office of HSI from 2010 until 2014 and in HSI's San Diego office from 2007 until 2010. While in Tyler and San Diego, he also investigated human trafficking cases. He was a member of the North Texas Anti-Trafficking Taskforce from 2014 through 2016, which is an organization made up of federal, state and local law enforcement agencies that work together to combat sex and labor trafficking in North Texas. Agent Catalan has investigated numerous human trafficking cases, and he has also attended human trafficking training.

Agent Catalan's expected testimony will include: (1) his background and experience; (2) an explanation of common sex-trafficking practices, including how pimps

routinely keep all of the proceeds from the commercial sex acts and like to flaunt the money being made, among other things; (3) the language used in this context and the sub-culture of the commercial-sex life (see more below); (4) an explanation of the terms and the roles of various individuals in such a conspiracy including the pimp(s), and commercial sex customer/ “john”; (5) an explanation of methods of control, recruitment and coercion used by traffickers, including violence (against the victim and against others in their presence), threats, charm, false promises of a better life, claiming to be a victim’s “boyfriend,” among others; (6) an explanation of the common tools and methods used to promote commercial sex (including online sex sites such as Backpage.com) and common recruitment tools for victims including Facebook; and (7) the toll on the exploitation victims in sex-trafficking situations, including the physical toll based on numerous daily sexual encounters, contracting sexually-transmitted diseases, violence experienced during commercial sex acts, and others.

He is also expected to review Facebook posts, messages, photos and videos related to the defendant in this case to explain their meaning. He will review communications in this case between the phone used to set up the prostitution engagements and commercial sex customers to explain the language used and will testify they are consistent with sex trafficking/prostitution occurring, as well as reviewing Backpage.com advertisements to explain their general content and function.

Request for Notice of Defense Experts

This Disclosure of Expert Witnesses also serves as the Government’s request for

notice of expert testimony by the Defendant, pursuant to Federal Rule of Criminal Procedure 16. Specifically, the Government requests that the Defendant disclose to the Government a written summary of testimony that the Defendant intends to present at trial pursuant to Federal Rules of Evidence 702, 703 and 705, as well as requesting a CV of any expert the defense intends to call.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I certify that on May 10, 2017, a true and correct copy of the foregoing Government's Designation of Expert Witnesses was filed with the Clerk of Court using the electronic case filing system, which will then send a notification of electronic filing to the following:

Chris Lewis

/s/ Cara Foos Pierce
Cara Foos Pierce
Assistant United States Attorney